

U.S. Multistakeholder Effort for Certification of E-Waste Recyclers

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December 2007**

RECYCLER CERTIFICATION

- **INCREASING INTEREST IN RECYCLER CERTIFICATION**
 - MANY STAKEHOLDER GROUPS INTERESTED
 - OECD ESM GUIDELINES PROMOTE CERTIFICATION
- **SOME RECYCLING INDUSTRY GROUPS HAVE OR ARE DEVELOPING PROGRAMS**
- **EPA BELIEVES SUCH PROGRAMS ARE VALUABLE & ARE ALTERNATIVES TO REGULATION**
- **EPA DOES NOT PLAN TO “CERTIFY” OR “APPROVE” RECYCLERS**

CERTIFICATION TO “RESPONSIBLE RECYCLER” (R2) PRACTICES

- **EPA SPONSORING MULTISTAKEHOLDER EFFORT FOR DEVELOPMENT OF “R2” PRACTICES**
 - INVOLVES EPA, OSHA, STATES, MANUFACTURERS, RECYCLERS, ENVIRONMENTAL NGOs
- **RECYCLERS WILL VOLUNTEER TO BE CERTIFIED AS TO CONFORMANCE WITH THE R2 PRACTICES**
- **NATURE OF CERTIFYING ORGANIZATIONS STILL UNCLEAR**
- **COMPLETE DEVELOPMENT BY SUMMER 2008**

PROGRESS

■ A GREAT DEAL OF EFFORT OVER THE LAST 2 YEARS

- ABOUT 20 VERSIONS DRAFTED OF THE “R2” PRACTICES
- MULTISTAKEHOLDER & WIDER PUBLIC INPUT
- RECENTLY COMPLETED REVIEW OF THE “R2” PRACTICES DOCUMENT BY EXPERIENCED AUDITORS
- REVISING DOCUMENT BASED ON AUDITOR REVIEW

NEXT STEPS

- CONTINUING TO IMPROVE R2 PRACTICES DOCUMENT
- IDENTIFYING RECYCLERS WHO WILL VOLUNTEER TO “FIELD TEST” (short audit) THE DOCUMENT
- EXPECT TO CONDUCT FIELD TESTING IN JANUARY 2008
- FOLLOWING FIELD TESTING, THE R2 PRACTICES DOCUMENT WILL BE MODIFIED

OVERARCHING PRINCIPLES

- VOLUNTARY PROGRAM
- PRIMARY FOCUS IS ON HUMAN HEALTH & THE ENVIRONMENT
- ELECTRONICS RECYCLERS MUST COMPLY WITH EXISTING FEDERAL, STATE, LOCAL & INTERNATIONAL REQUIREMENTS
- EPA WILL NOT DIRECT IMPLEMENTATION OF THE PROGRAM
 - MULTISTAKEHOLDER “R2” PRACTICES
 - USE OF “THIRD-PARTY” AUDITORS AND CERTIFYING BODIES

ESSENTIAL CONCEPTS OF “R2” PRACTICES

- **REUSE & RECYCLING ARE PREFERRED OVER DISPOSAL**
- **WORKER & ENVIRONMENTAL PROTECTION**
- **DOWNSTREAM DUE DILIGENCE (including export) FOR PRIORITY MATERIALS**
 - Batteries, mercury lamps & devices, CRTs, circuit boards, & possibly toner
- **NEED FOR ENVIRONMENTAL MANAGEMENT SYSTEMS (EMS)**
- **DATA SECURITY**
- **COMPLIANCE WITH ALL LAWS & RULES**

OTHER AREAS ADDRESSED BY “R2” PRACTICES

- RECORDKEEPING
- DIFFERENTIATING REUSE FROM RECYCLING
- CONDITIONS APPLICABLE TO USE OF SMELTERS
- CONDITIONS APPLICABLE TO USE OF DISPOSAL FACILITIES
- TRANSPORT
- INSURANCE
- RECYCLING FACILITY CLOSURE & FINANCIAL RESPONSIBILITY
- FACILITY SECURITY

DRAFT “R2” EXPORT PROVISIONS for RECYCLER CERTIFICATION

- **Recycler will need to obtain documentation from importing and transit countries of legality of import of certain materials by the foreign facility**
 - **Batteries, mercury lamps & devices, CRTs, circuit boards, & possibly toner**
- **Recycler can request EPA to help obtain that documentation**

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